

1 GRIFFITH H. HAYES, ESQ.  
2 Nevada Bar No. 7374  
3 RYAN B. ZIMMER, ESQ.  
4 Nevada Bar No. 14784  
5 **LITCHFIELD CAVO LLP**  
6 3993 Howard Hughes Parkway, Suite 100  
7 Las Vegas, Nevada 89169  
8 Telephone: (702) 949-3100  
9 Facsimile: (702) 916-1776  
10 Hayes@LitchfieldCavo.com  
11 Zimmer@LitchfieldCavo.com

12 *Attorneys for Plaintiff*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA – NORTHERN DIVISION**

15 TESORO REFINING & MARKETING  
16 COMPANY LLC, a Delaware limited liability  
17 company,

18 Plaintiff,  
19 v.

20 ALANDDON LLC, a Nevada limited liability  
21 company; DONALD A. LEHR, individually;  
22 VALARIE M. LEHR, individually; ALLAN G.  
23 FIEGEHEN, individually; and KRISTINE A.  
24 FIEGEHEN, individually;

25 Defendants.

26 CASE NO.: 3:19-cv-00449- LRH-WGC

27 **STIPULATION TO EXTEND TIME TO  
RESPOND TO COMPLAINT; ORDER**

28 Plaintiff, **TESORO REFINING & MARKETING COMPANY LLC** (“Plaintiff”) by and  
29 through its attorneys of record, Litchfield Cavo LLP, and Defendants, **ALANDDON LLC, DONALD  
30 A. LEHR, VALARIE M. LEHR and ALLAN G. FIEGEHEN** (collectively referred to as  
31 “Defendants”) by and through their attorneys of record, the law firm of Allison MacKenzie, stipulate  
32 and agree as follows:

- 33 1. Plaintiff filed its action on August 2, 2019.
- 34 2. Alanddon LLC, Donald A. Lehr and Valarie M. Lehr were personally served on  
35 August 12, 2019.
- 36 3. The responsive pleading of Alanddon LLC, Donald A. Lehr and Valarie M. Lehr is  
37 currently due September 3, 2019.
- 38 4. Attorney Ryan Russell of Allison MacKenzie law firm accepted service on behalf of

1 Allan G. Fiegehen on August 29, 2019.

2 5. The responsive pleading of Allan G. Fiegehen is currently due on September 19, 2019.

3 6. Good cause exists to extend the deadline for Defendants to respond to Plaintiff's  
4 complaint because Mr. Russell was recently retained and will be providing a response for all  
5 Defendants herein.

6 7. Defendants shall have an extension of 21 days from August 29, 2019, to answer, move,  
7 or otherwise respond to Plaintiff's complaint to and including September 19, 2019.

8 Dated: September 3, 2019

9 **ALLISON MACKENZIE**

10 By: /s/ Ryan Russell  
RYAN RUSSELL, ESQ.  
11 Nevada Bar No. 8646  
12 402 North Division Street  
Carson City, Nevada 89703  
13 Tel: 775-687-0202  
rrussell@allisonmackenzie.com  
Attorneys for Defendants,

14 Dated: September 3, 2019

15 **LITCHFIELD CAVO LLP**

16 By: /s/ Ryan B. Zimmer  
17 GRIFFITH H. HAYES, ESQ.  
Nevada Bar No. 7374  
18 RYAN B. ZIMMER, ESQ.  
Nevada Bar No. 14784  
3993 Howard Hughes Parkway, Suite 100  
19 Las Vegas, Nevada 89169  
Telephone: (702) 949-3100  
Facsimile: (702) 916-1776  
20 Hayes@LitchfieldCavo.com  
Zimmer@LitchfieldCavo.com  
21 Attorneys for Plaintiff

22 **ORDER**

23 Pursuant to the parties' stipulation, **IT IS SO ORDERED**. Defendants should answer or  
24 otherwise respond to Plaintiff's complaint on or before Thursday, September 19, 2019.

25 Dated: September 4, 2019

26 

27 **UNITED STATES MAGISTRATE JUDGE**